

# **EXHIBIT E**

**WILLKIE FARR & GALLAGHER LLP**  
BENEDICT Y. HUR (SBN: 224018)  
bhur@willkie.com  
SIMONA AGNOLUCCI (SBN: 246943)  
sagnolucci@willkie.com  
EDUARDO E. SANTACANA (SBN: 281668)  
esantacana@willkie.com  
JOSHUA ANDERSON (SBN: 312836)  
jdanderson@willkie.com  
YUHAN ALICE CHI (SBN: 324072)  
ychi@willkie.com  
NAIARA TOKER (SBN: 346145)  
ntoker@willkie.com  
ANIKA HOLLAND (SBN: 336071)  
aholland@willkie.com  
333 Bush Street, 34th Floor  
San Francisco, CA 94104  
Telephone: (415) 858-7400

ALEXIS DORNER (DC Bar No. 1781014)\*  
adorner@willkie.com  
1875 K Street NW  
Washington, DC 20006  
Telephone: (202) 303-1000  
\*Admitted *pro hac vice*

Attorneys for Defendant  
GOOGLE LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

MARY L. SMITH, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

Case No.: 5:23-cv-03527-PCP  
(Consol. w/ 5:23-cv-04191-BLF)

**DEFENDANT GOOGLE LLC'S  
RESPONSES TO PLAINTIFFS'  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE**

Complaint Filed: 7/14/2023  
Trial Date: N/A

*Hon. P. Casey Pitts, District Judge  
San Jose Courthouse, Ctrm. 8 – 4<sup>th</sup> Floor*

**PROPOUNDING PARTY: PLAINTIFFS and THE PROPOSED CLASS**

**RESPONDING PARTY: DEFENDANT Google LLC**

**SET NO.: ONE**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Federal Rules”) and the Civil Local Rules of the United States District Court for the Northern District of California (“Local Rules”), Defendant Google LLC hereby objects and responds to Mary L. Smith, Malissa Adams, Tracylyn Patterson, Cary Goldberg, Tyisha Sheppeard, Teresa Wright, Rheazene Taylor, Tiffany Layton, Jamila Armstrong, and Monica Townsend’s (“Plaintiffs”) First Set of Requests for Production of Documents (each a “Request” and collectively the “Requests”).

**GENERAL STATEMENT AND GENERAL OBJECTIONS**

1. Each of Google’s responses is subject to, and incorporates, the following general statement and objections. Google specifically incorporates each of these general objections into its responses to each of Plaintiffs’ Requests, whether or not each such general objection is expressly referred to in Google’s responses to a specific Request.

2. Google objects to the instructions, definitions, and Requests to the extent that they are broader than, or attempt to impose conditions, obligations, or duties beyond those required by the Federal Rules, the Local Rules, or any other applicable authority. Google’s responses will be provided in accordance with the Federal Rules, the Local Rules, and any other applicable authority.

3. Google objects to any Request to the extent that it seeks information protected from discovery by: (1) the attorney-client privilege; (b) the attorney work-product doctrine; (c) the common-interest or and joint-defense doctrines; and/or (d) any other applicable privilege, doctrine, immunity or protection from disclosure afforded by state or federal law.

4. Google objects to any Request to the extent that it is overbroad, unduly burdensome, compound, and/or oppressive. In particular, Google objects to any Request to the extent that it calls for information not relevant to the claims or defenses of the parties, or proportional to the needs of the case.

5. Google objects to each Request to the extent it is vague, ambiguous, overly broad, or unduly burdensome as to time frame.

1           6. Google objects to the instructions, definitions, and Requests to the extent they seek or  
2 purport to require the identification of “any,” “all,” “each,” or “every” document, communication,  
3 person, entity, or other thing regarding or relating to a particular subject matter, as unduly  
4 burdensome, overbroad, and not proportional to the needs of the Action.

5           7. Google objects to any Request to the extent that it purports to attribute any special or  
6 unusual meaning to any term or phrase.

7           8. Google objects to the Requests to the extent they seek confidential, proprietary, or  
8 trade secret information of third parties.

9           9. Google objects to any instruction or Request to the extent that it would impose a duty  
10 on Google to undertake a search for, or an evaluation of, information for which Plaintiffs are equally  
11 able to search for and evaluate, including information that is publicly available, in the possession of  
12 third parties, and/or are already in the possession of Plaintiffs.

13           10. Google’s objections and responses to these Requests are not intended to waive or  
14 prejudice any objections Google may assert now or in the future, including, without limitation,  
15 objections as to the relevance of the subject matter of any Request, or as to the admissibility of any  
16 information or category of information at trial or in any other proceedings. Google expressly  
17 reserves any and all rights and privileges under the Federal Rules of Civil Procedure, the Federal  
18 Rules of Evidence, the Local Rules, and any other applicable laws or rules, and the failure to assert  
19 such rights and privileges or the inadvertent disclosure by Google of information protected by such  
20 rights and privileges shall not constitute a waiver thereof, either with respect to these responses or  
21 with respect to any future discovery responses or objections.

22           11. Google objects to Plaintiffs’ definitions, instructions, and Requests to the extent that  
23 they require Google to search, review, and produce emails or other electronic documents outside  
24 the scope of, or otherwise conflict with, the Federal Rules, Local Rules, or any other relevant rules  
25 or Court orders governing this Action.

26           12. Google objects to Plaintiffs’ “Definitions” and to any Request to the extent they  
27 purport to give meaning or legal significance to a document, fact, or purported fact whose meaning  
28 or significance is subject to dispute between the parties. Google’s responses to each of Plaintiffs’

1 Requests shall not constitute an admission or concession to any of the definitions, terms, and phrases  
2 used therein. By responding to any Requests, Google does not concede the relevance or  
3 admissibility of any of the information provided.

4 13. Google has responded to the Requests as it interprets and understands them. If  
5 Plaintiffs subsequently assert an interpretation of any Request that differs from Google's  
6 understanding of that Requests, Google reserves the right to supplement its objections and/or  
7 responses.

8 14. Discovery in this matter is ongoing. Accordingly, Google reserves the right to change,  
9 amend, or supplement any or all of the matters contained in these responses as Google's  
10 investigation continues, additional facts are ascertained, analyses are made, research is completed,  
11 and additional documents are subsequently discovered, collected, and/or reviewed.

#### 12 **OBJECTIONS TO DEFINITIONS**

13 15. Google objects to the definition of "CLASS PERIOD" as vague and ambiguous,  
14 overbroad, unduly burdensome, and disproportional to the needs of this Action. Google further  
15 objects to the definition to the extent it exceeds the applicable statutes of limitation for the claims  
16 alleged in Plaintiffs' Consolidated Class Action Complaint ("Complaint"). Google further  
17 incorporates by reference its objections below as to the terms "YOU," "WEBSITE VISITOR  
18 DATA," and "SUBJECT WEBSITES." Google is willing to meet and confer regarding a relevant  
19 time period that is proportional to the needs of this Action.

20 16. Google objects to the definitions of "GOOGLE," "YOU," and "YOUR" to the extent  
21 that it purports to include forms of information not discoverable under the Federal Rules, the Local  
22 Rules, or any other applicable authority. Google further objects to the extent it seeks information  
23 or refers to documents controlled by individuals who are not parties to this litigation and/or which  
24 are not within Google's control. Google construes "GOOGLE," "YOU," and "YOUR," to mean  
25 Google LLC.

26 17. Google objects to the definition of "GOOGLE ANALYTICS" as vague and  
27 ambiguous, overbroad, and unduly burdensome. Google further objects to the definition to the  
28 extent it seeks to include Google products that are not at issue in Plaintiff's Complaint. Google

1 further objects as vague and ambiguous as to the undefined terms “Google Tag,” “any other related  
2 technology,” “transmission,” and “data.” Google further incorporates by reference its objections to  
3 definitions of “SUBJECT WEBSITES” and “GOOGLE.” Google construes the term “GOOGLE  
4 ANALYTICS” as the analytics tool called Google Analytics offered by Google that was used by  
5 the third-party developers, TaxAct, TaxSlayer, and H&R Block (together, the “Developers”) on  
6 their respective websites, as specifically identified in Plaintiff’s Complaint.

7 18. Google objects to the definition of “SUBJECT WEBSITES” as vague and  
8 ambiguous, overbroad, and unduly burdensome. Google further objects to the definition as seeking  
9 irrelevant information and thus disproportionate to the needs of the Action to the extent it seeks to  
10 include “any website” that customers of H&R Block, TaxAct, and TaxSlayer can use to “prepare  
11 and/or file their taxes online” regardless of whether such websites incorporated Google Analytics,  
12 were in fact used by any Plaintiff, or involved the transmission of any information. Google construes  
13 the term “SUBJECT WEBSITES” as the Developers’ websites on which the Developers  
14 incorporated Google Analytics and that allow the Developers’ users to enter their financial  
15 information and file taxes online.

16 19. Google objects to the definition of “WEBSITE VISITOR DATA” as vague and  
17 ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the Action. Google  
18 further objects to the definition as incomprehensible, unduly burdensome, and disproportionate to  
19 the needs of the Action to the extent it purports to include “all information” about “visitors” and  
20 “online tax preparation and tax filings.” Google further incorporates herein its objections to the  
21 definitions of “SUBJECT WEBSITES,” “YOU,” and “GOOGLE ANALYTICS.” Google further  
22 objects to the definition as irrelevant as none of the Requests use this term. Google is willing to  
23 meet and confer regarding the relevant and proportional definition of “WEBSITE VISITOR  
24 DATA.”

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**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:**

All documents that YOU contend support any affirmative defense YOU assert in this case.

**RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it seeks documents that are publicly available and thus are equally accessible to Plaintiffs; (ii) it is premature as discovery and Google's investigation are both on-going; and (iii) it is overbroad and unduly burdensome to the extent it seeks "all" documents within a broad category. Google also objects to this Request to the extent it seeks documents protected by the attorney-client privilege, work-product privilege, and/or other applicable privileges.

Subject to the above objections, Google responds that, following the entry of an ESI protocol, Google will produce relevant and non-privileged documents responsive to this Request that can be located in the course of a reasonable search.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:**

All documents referenced in YOUR initial disclosures pursuant to F.R.C.P. 26(a)(1)(ii).

**RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is duplicative of Plaintiffs' Requests for Production of Documents Set One Request No. 1; (ii) it seeks documents that are publicly available and thus are equally accessible to Plaintiffs; (iii) it is overbroad and unduly burdensome to the extent it seeks "all" documents within broad categories, whether or not Google ultimately offers any particular subset of those categories in its defense; (iv) it is premature as discovery and Google's investigation are both on-going; and (v) it is overbroad and unduly burdensome as to time, including to the extent it seeks information outside the applicable statutes of limitation. Google also objects to this Request to the extent it seeks documents protected by the attorney-client privilege, work-product privilege, and/or other applicable privileges.

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1 Subject to the above objections, Google responds that, following the entry of an ESI  
2 protocol, Google will produce relevant and non-privileged documents responsive to this Request  
3 that can be located in the course of a reasonable search.

4 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:**

5 All raw data that YOU received from the SUBJECT WEBSITES during the CLASS  
6 PERIOD via GOOGLE ANALYTICS. If this data is available in csv or similar structured data  
7 format, please produce it in that format.

8 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:**

9 Google incorporates its general responses and objections as set forth above. Google further  
10 objects to this Request on the grounds that: (i) it is vague and ambiguous as to the undefined terms  
11 “raw data”, “csv”, and “structured data”; (ii) it is overbroad and disproportionate to the needs of the  
12 Action and thus any corresponding search and production would be unduly burdensome; (iii) it  
13 seeks documents that are not relevant to any claims or defenses in the Action and thus seeks  
14 documents outside the scope of permissible discovery; (iv) it is unduly burdensome, overbroad, and  
15 disproportional to the needs of the case because it seeks documents and information relating to data  
16 that is not at issue in this case; (v) it is overbroad and unduly burdensome to the extent it seeks “all”  
17 documents within an overbroad category of documents related to multiple websites, without regard  
18 to the relevance of the data; and (vi) it is overbroad and unduly burdensome as to time, including to  
19 the extent it seeks information outside the applicable statutes of limitation. Google also objects to  
20 this Request to the extent it seeks documents protected by the attorney-client privilege, work-  
21 product privilege, and/or other applicable privileges.

22 Subject to the above objections, Google responds that it will not produce any documents in  
23 response to this Request as currently presented but will consider a properly tailored request after the  
24 parties have met and conferred to discuss this Request.

25 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:**

26 All documents and communications discussing or referencing the transmission, from any  
27 website, of tax preparation or tax filing information to YOU, such as a website visitor’s income,  
28



1 refund amounts, taxes owed, names of dependents, or any other information disclosed in connection  
2 with an online tax preparation or tax filing.

3 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:**

4 Google incorporates its general responses and objections as set forth above. Google further  
5 objects to this Request on the grounds that: (i) it is vague and ambiguous as to the undefined terms  
6 “communications,” “discussing,” “referencing,” “transmission”, “tax filing information,” and  
7 “website visitor”; (ii) it is overbroad and unduly burdensome to the extent it seeks “all” documents  
8 within an overbroad category of documents related to an open-ended and undefined number of  
9 websites, without regard to the relevance of the website or data to any claim or defense in this Action  
10 and (iii) it is overbroad and unduly burdensome as to time, including to the extent it seeks  
11 information outside the applicable statutes of limitation Google also objects to this Request to the  
12 extent it seeks documents protected by the attorney-client privilege, work-product privilege, and/or  
13 other applicable privileges.

14 Subject to the above objections, Google responds that it will not produce any documents in  
15 response to this Request as currently presented but will consider a properly tailored request after the  
16 parties have met and conferred to discuss this Request.

17 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:**

18 The REPORT describes interviews between GOOGLE officials and Congressional staffers  
19 on March 21, 2023 and March 22, 2023. *See id.*, fn. 73, 103. Please produce the following  
20 documents or materials concerning that interview:

- 21 i. All transcripts, notes, audio recordings, video recordings, or other contemporaneous  
22 records of those interviews.
- 23 ii. All communications and documents discussing or referencing either of those  
24 interviews, whether generated internally within GOOGLE or exchanged with third  
25 parties.

26 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:**

27 Google incorporates its general responses and objections as set forth above. Google further  
28 objects to this Request on the grounds that: (i) it is vague and ambiguous as to the undefined terms

1 “materials”, “interview”, “recordings” and “exchange”, as well as the phrase “generated internally”;  
 2 (ii) it seeks documents that are not relevant to any claims or defenses in the Action and thus seeks  
 3 documents outside the scope of permissible discovery; (iii) it is unduly burdensome, overbroad, and  
 4 disproportionate to the needs of the Action to the extent that it seeks information in Plaintiff’s  
 5 possession, publicly available, or otherwise obtainable from some other source that is more  
 6 convenient, less burdensome, or less expensive; and (iv) it is overbroad and unduly burdensome to  
 7 the extent it seeks “all” documents discussing or referencing events that have no relevance to any  
 8 claim or defense in this Action. Google also objects to this Request to the extent it seeks documents  
 9 protected by the attorney-client privilege, work-product privilege, and/or other applicable  
 10 privileges.

11 Subject to the above objections, and to the extent that any non-privileged and responsive  
 12 documents are in Google’s possession, custody or control, Google responds that it will not produce  
 13 any documents in response to this Request as currently presented but will consider a properly  
 14 tailored request after the parties have met and conferred to discuss this Request.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:**

16 All documents concerning the letter from Google Vice President of Government Affairs and  
 17 Public Policy, US and Canada, to Senator Elizabeth Warren, dated January 17, 2023.

18 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:**

19 Google incorporates its general responses and objections as set forth above. Google further  
 20 objects to this Request on the grounds that: (i) it is vague and ambiguous as to the undefined terms  
 21 “documents”, “concerning”, and “letter”; (ii) it seeks documents that are not be relevant to any  
 22 claims or defenses in the Action and thus seeks documents outside the scope of permissible  
 23 discovery; (iii) it is unduly burdensome, overbroad, and disproportionate to the needs of the Action  
 24 to the extent that it seeks information in Plaintiff’s possession, publicly available, or otherwise  
 25 obtainable from some other source that is more convenient, less burdensome, or less expensive; (iv)  
 26 it presupposes the existence of a “letter from Google Vice President of Government Affairs and  
 27 Public Policy, US and Canada, to Senator Elizabeth Warren, dated January 17, 2023”; and (v) it is  
 28 overbroad and unduly burdensome to the extent it seeks “all” documents discussing or referencing

1 matters that have no relevance to any claim or defense in this Action. Google also objects to this  
2 Request to the extent it seeks documents protected by the attorney-client privilege, work-product  
3 privilege, and/or other applicable privileges.

4 Subject to the above objections, Google responds that it will not produce any documents in  
5 response to this Request as currently presented but will consider a properly tailored request after the  
6 parties have met and conferred to discuss this Request.

7  
8  
9 Date: August 22, 2024

**WILLKIE FARR & GALLAGHER LLP**

10 By: /s/ Benedict Y. Hur  
11 Benedict Hur  
12 Simona Agnolucci  
13 Eduardo E. Santacana  
14 Joshua Anderson  
15 Yuhua Alice Chi  
16 Naiara Toker  
17 Anika Holland  
18 Alexis Dörner  
19  
20 *Attorneys for Defendant*  
21 *Google LLC*  
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**PROOF OF SERVICE**

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is Willkie Farr & Gallagher LLP, 333 Bush Street, 34<sup>th</sup> Floor, San Francisco, CA 94104.

On August 22, 2024, I served the following document(s) on the individuals identified in the attached service list:

**DEFENDANT GOOGLE LLC'S RESPONSES TO  
REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE**

- ☒ **Via Electronic Mail** as a PDF file, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.
- ☐ **Via US mail** by enclosing the documents in an envelope and placing the envelope for collection and mailing on the date and at the place from the included service list following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2024 at San Francisco, California.

/s/ Yuhan Alice Chi  
Yuhan Alice Chi

**SERVICE LIST**

<p>Joel Dashiell Smith SMITH KRIVOSHEY, PC 867 Boylston Street 5th Floor #1520 Boston, MA 02116 Tel: 617-377-7404 <a href="mailto:joel@skclassactions.com">joel@skclassactions.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>	<p>John G. Emerson EMERSON FIRM, PLLC 2500 Wilcrest, Suite 300 Houston, TX 77042 Tel: (800) 551-8649 <a href="mailto:jemerson@emersonfirm.com">jemerson@emersonfirm.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>
<p>Kate M. Baxter-Kauf (<i>Pro Hac Vice</i>) Rebecca A. Peterson (<i>Pro Hac Vice</i>) Robert K. Shelquist (<i>Pro Hac Vice</i>) LOCKRIDGE GRINDAL NAUEN P.L.L.P. 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401 Tel: (612) 596-4097 <a href="mailto:kmbaxter-kauf@locklaw.com">kmbaxter-kauf@locklaw.com</a> <a href="mailto:rapeterson@locklaw.com">rapeterson@locklaw.com</a> <a href="mailto:shelquist@locklaw.com">shelquist@locklaw.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>	<p>Marshal J. Hoda (<i>Pro Hac Vice</i>) THE HODA LAW FIRM, PLLC 3120 Southwest Fwy Ste 101 PMB 51811 Houston, TX 77098 Tel: 832-848-0036 <a href="mailto:marshal@thehodalawfirm.com">marshal@thehodalawfirm.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>
<p>Michael Liskow GEORGE FELDMAN MCDONALD, PLLC 745 Fifth Avenue, Suite 500 New York, NY 10151 Tel: (561) 232-6002 <a href="mailto:mliskow@4-justice.com">mliskow@4-justice.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>	<p>Neal J. Deckant BURSOR &amp; FISHER, P.A. 1990 North California Boulevard, Suite 940 Walnut Creek, CA 94596 (925) 300-4455 <a href="mailto:ndeckant@bursor.com">ndeckant@bursor.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>
<p>Patrick Yarborough FOSTER YARBOROUGH PLLC 917 Franklin Street, Suite 220 Houston, TX 77002 (713) 331-5254 <a href="mailto:patrick@fosteryarborough.com">patrick@fosteryarborough.com</a></p> <p><i>Attorneys for Plaintiff Class</i></p>	<p>Robert Brent Wisner WISNER BAUM, LLP 11111 Santa Monica Blvd., Suite 1750 Los Angeles, CA 90025 Tel: 310-820-6231 <a href="mailto:rbwisner@wisnerbaum.com">rbwisner@wisnerbaum.com</a></p> <p><i>Attorneys for Objector Justin Hunt</i></p>

1 Email service list:

2 [joel@skclassactions.com](mailto:joel@skclassactions.com); [jemerson@emersonfirm.com](mailto:jemerson@emersonfirm.com); [kmbaxter-kauf@locklaw.com](mailto:kmbaxter-kauf@locklaw.com)  
3 [rapeterson@locklaw.com](mailto:rapeterson@locklaw.com); [shelquist@locklaw.com](mailto:shelquist@locklaw.com); [marshal@thehodalawfirm.com](mailto:marshal@thehodalawfirm.com);  
4 [mliskow@4-justice.com](mailto:mliskow@4-justice.com); [ndeckant@bursor.com](mailto:ndeckant@bursor.com); [patrick@fosteryarborough.com](mailto:patrick@fosteryarborough.com);  
5 [rbwisner@wisnerbaum.com](mailto:rbwisner@wisnerbaum.com)

6 WFG email list:

7 [bhur@willkie.com](mailto:bhur@willkie.com); [sagnolucci@willkie.com](mailto:sagnolucci@willkie.com); [esantacana@willkie.com](mailto:esantacana@willkie.com); [jdanderson@willkie.com](mailto:jdanderson@willkie.com);  
8 [ychi@willkie.com](mailto:ychi@willkie.com); [ntoker@willkie.com](mailto:ntoker@willkie.com); [aholland@willkie.com](mailto:aholland@willkie.com); [fcastro@willkie.com](mailto:fcastro@willkie.com);  
9 [lcardona@willkie.com](mailto:lcardona@willkie.com); [tnocco@willkie.com](mailto:tnocco@willkie.com)  
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